## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS VICTORIA DIVISION

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	<b>1</b>
Debtor.	§	

### **EXHIBIT I**

Docket No. FBT-CV-18-6076475-S : JUDICIAL DISTRICT

:

ERICA LAFFERTY, et al. : OF FAIRFIELD

:

v. : AT BRIDGEPORT

ALEX JONES, et al. : JANUARY 24, 2019

### RESPONSES TO PLAINTIFFS' FIRST SET OF SPECIAL INTERROGATORIES TO ALEX JONES

#### 1. Identify:

- a. All business organizations and/or other entities in which you have ownership and/or control
- b. The officers or members of all organizations and/or entities responsive to part (a)
- c. The shareholders or other owners of all organizations and/or entities responsive to part (a)
- d. The employees of all organizations and/or entities responsive to part (a)

#### ANSWER:

- a. I, Alex Jones, have ownership and/or control of the following business organizations and/or other entities: Free Speech Systems LLC, InfoWars LLC, InfoWars Health LLC, and PrisonPlanet TV LLC
- b. I am the sole officer and member of all the organizations and/or entities responsive to part (a).
- c. I am the sole shareholder and owner of all organizations and/or entities responsive to part (a).
- d. The employees of all organizations and/or entities responsive to part (a) are attached hereto as Exhibit 1. Free Speech Systems has the employees listed in Exhibit 1, and the Department heads/managers are as follows: Rob Dew, Manager of Media/Video Production; Paul Joseph Watson, Editor/Manager of Writers; Tim Fruge, Director of Business Operations.

concerning that subject matter. Identify the owner of such domain names or URLs.

ANSWER:

Infowars.com, PrisonPlanet.com, prisonplanet.tv

5. Identify any witnesses you may call at a hearing on a special motion to dismiss.

ANSWER:

Alex Jones and the Plaintiffs

Under the penalty of perjury, I certify the above answers to these interrogatories are true and complete to the best of my knowledge.

Alex Jones

Dated: 3-29-19

Subscribed and Sworn before me:

Timothy Fruge

Dated: 3-29-19

My Commission Expires:

TIMOTHY JAMES FRUGE Notery Public, State of Texas Comm. Expires 04-21-2022 Notary ID 129791388

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ALEX JONES, et al. : JANUARY 24, 2019

# RESPONSES TO PLAINTIFFS' FIRST SET OF SPECIAL INTERROGATORIES TO FREE SPEECH SYSTEMS LLC, INFOWARS, LLC, PRISON PLANET TV LLC and INFOWARS HEALTH, LLC

- 1. Identify:
- a. Your officers
- b. Your members
- c. Your shareholders or other owners
- d. Your employees
- e. All business organizations and/or other entities in which you have ownership and/or control

#### ANSWER:

- a. b. & c . I, Alex Jones, am the sole owner, officer and member of each of the above named LLCs.
- d. Only Free Speech Systems LLC has employees those employees are attached hereto as Exhibit 1. The Department heads/managers of Free Speech Systems LLC are as follows: Rob Dew, Manager of Media/Video Production; Paul Joseph Watson, Editor/Manager of Writers; Tim Fruge, Director of Business Operations.
- 2. Identify employees responsible for marketing data, research, and/or analytics concerning Infowars, Infowars.com, The Alex Jones Radio Show, and Alex Jones. If such responsibilities were outsourced our contracted out, identify the individual and/or entities to whom they were contracted.

Shooting, Sandy Hook Investigation, Non-Governmental Investigation, Sandy Hook Families, or Sandy Hook Hoax Theory, or otherwise contain content concerning that subject matter. Identify the owner of such domain names or URLs.

#### ANSWER:

As to Free Speech Systems LLC only: Infowars.com, PrisonPlanet.com, prisonplanet.tv. There are dozens of other URLs, but those are either not active or are set up to act as pointer (redirect) site to the main Info Wars website. A list can be assembled, there are no such URLs referencing Sandy Hook or mass shootings.

The other entities have no URLs.

5. Identify any witnesses you may call at a hearing on a special motion to dismiss.

ANSWER:

Alex Jones and the Plaintiffs

Under the penalty of perjury, I certify the above answers to these interrogatories are true and complete to the best of my knowledge.

Dated: 3-29-19

Alex Jones as member of Infowars LLC, Free Speech Systems LLC, Infowars Health LLC, Prison Planet TV LLC

Subscribed and Sworn before me:

Timothy Fruge

Dated: 3-29-19

My Commission Expires:

TIMOTHY JAMES FRUGE
Notary Public, State of Texas
Comm. Expires 04-21-2022
Notary ID 129791368